

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>PAUL BAUER</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>ALFREDO PEREZ</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>JULIO PEREZ</b>	<b>:</b>	<b>wire fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1957 (financial transactions</b>
	<b>:</b>	<b>with criminally derived funds - 8 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The Pinto-Spinali Group (“PSG”) was a group of approximately ten companies located in Cumana, Venezuela, dedicated to commercial fishing. One of its deep-sea tuna vessels was called the Canaima.

2. In or about October 2002, PSG entered into a contract with Astilleros y Maestranzas de la Armada (“ASMAR”) for ASMAR to lengthen and repair the Canaima. The work on the Canaima was done in Chile. At the end of September 2004, PSG owed ASMAR a balance of approximately \$4,901,945.82 for the repair work.